

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LUMINATI NETWORKS LTD.

v.

BI SCIENCE INC.

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Case No. 2:18-CV-0483-JRG

**DECLARATION OF RONALD WIELKOPOLSKI IN SUPPORT OF PLAINTIFF
LUMINATI NETWORKS LTD.'S MOTION TO ENFORCE SETTLEMENT
AGREEMENT**

Pursuant to 28 U.S.C. § 1746, I, Ronald Wielkopolski, hereby declare as follows:

1. I am more than eighteen (18) years of age and I am competent to make this declaration. I have personal knowledge of the facts stated herein, and would testify to such facts under oath if asked to do so. I am an associate attorney with the law firm of RuyakCherian LLP and counsel of record for Plaintiff Luminati Networks, Ltd. ("Luminati").

2. Exhibit A is a true and correct copy of the Settlement Agreement between the parties as confirmed by mediator William Cornelius on February 24, 2020.

3. Exhibit B is a true and correct copy of email correspondence between mediator William Cornelius, and counsel from both parties on February 23, 2020.

4. Exhibit C is a true and correct copy of the Settlement Agreement between the parties as confirmed by mediator William Cornelius on February 24, 2020 and signed by O. Lenchner on February 25, 2020. This document was attached to an email from Luminati counsel to BI Science counsel dated February 25, 2020 within the email correspondence in Exhibit M.

5. Exhibit D is a true and correct copy of email correspondence between Luminati counsel and mediator William Cornelius on February 22, 2018.

6. Exhibit E is a true and correct copy of the Mediator's Proposal from mediator William Cornelius dated February 22, 2018.

7. Exhibit F is a true and correct copy of the email from Luminati counsel to mediator William Cornelius dated February 22, 2020 with Exhibits G-I as true and correct copies of the attachments to that email.

8. Exhibit J is a true and correct copy of the email from Luminati counsel to mediator William Cornelius dated February 23, 2020.

9. Exhibit K is a true and correct copy of email correspondence between mediator William Cornelius, and counsel from both parties on February 23, 2020.

10. Exhibit L is a true and correct copy of email correspondence between mediator William Cornelius, and counsel from both parties on February 23, 2020 regarding the Joint Motion to Stay.

11. Exhibit M is a true and correct copy of email correspondence between the parties between February 25 and February 27.

12. Exhibit N is a true and correct copy of a formal draft of the Settlement Agreement attached to the February 27, 2020 email from Luminati counsel to BI Science counsel.

13. Exhibit O is a true and correct copy of email correspondence between the parties between February 25 and March 11.

14. Exhibit P is a true and correct copy of the implementation mechanics schedule attached to the March 9, 2020 email from Luminati counsel to BI Science counsel.

15. Exhibit Q is a true and correct copy of BI Science's draft agreement attached to the March 11, 2020 email from BI Science counsel to Luminati counsel.

16. Exhibit R is a true and correct copy of a comparison of Exhibit Q against Exhibit N as performed on Microsoft Word on or around March 11, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 18, 2020 in Washington, DC.

/s/ Ronald Wielkopolski

Ronald Wielkopolski